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BY ECF

Hon. James W. Wicks
US District Court for the Eastern District

Re: International Wine Group, S.R.L v. Signature Selections, LLC
Docket Number: 2:21-cv-00513-ERK-JMW

Dear Judge Wicks:

The plaintiff hereby submits a pre-conference letter regarding this matter. Due to a motor vehicle accident I was involved in this week, I was unable to confer with the defendant's counsel and submit this letter two days before the conference.

This matter arises out wine deliveries from Italy to the United States. The plaintiff, a wine manufacturer in Italy, delivered various wines to the defendant, a wine wholesaler, based in the United States. Plaintiff claims that the defendant did not fully pay for the wine deliveries; the defendant asserted counterclaims that the product allegedly was defective. The plaintiff denied all counterclaims.

The plaintiff is an Italian company; the defendant is a US company registered with the Secretary of State in Delaware and operating in New York. As such, both are citizens of different states and different countries. The plaintiff served the Secretary of State in Delaware and in New York.

The plaintiff is currently gathering all documents, including emails supporting its position, and expects to be able to exchange those documents within 30 days. The plaintiff will also serve interrogatories Notice of Discovery and Inspection within 30 days.

Plaintiff expects that the defendant will also serve interrogatories and discovery requests within a similar time frame.

Following the document exchange, the plaintiff intends to depose the defendant. The plaintiff is also available for a deposition. Since the defendant resides in Italy, the plaintiff requests that the deposition be conducted by Zoom or MS Teams.

Plaintiff expects that the fact discovery can be completed within 60 days – i.e. August 14, 2021.

Very truly yours,

s/Hendrick Vandamme

